

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
DONALD DEAN JOHNSON,	:	Civil Action No. 11-cv-06341-PAC
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	LEAD PLAINTIFFS' NOTICE OF MOTION
	:	AND MOTION FOR FINAL APPROVAL OF
SEQUANS COMMUNICATIONS S.A., et al.,	:	SETTLEMENT AND PLAN OF
	:	ALLOCATION OF SETTLEMENT
Defendants.	:	PROCEEDS, AND AN AWARD OF
<hr/>	X	ATTORNEYS' FEES AND EXPENSES

PLEASE TAKE NOTICE that upon: (i) the Joint Declaration of Evan J. Kaufman and Brian C. Kerr affirmed on January 8, 2014; (ii) the Declaration of Evan J. Kaufman affirmed on January 8, 2014; (iii) the Declaration of Brian C. Kerr affirmed on January 8, 2014; (iv) the Declaration of Corey D. Holzer affirmed on December 20, 2013; (v) the Declaration of Jeffrey A. Berens affirmed on December 19, 2013; (vi) the Settlement Agreement dated October 31, 2013 and the Exhibits annexed thereto; (vii) the Declaration of Carole K. Sylvester affirmed on January 8, 2014; (viii) Lead Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Settlement and Plan of Allocation of Settlement Proceeds; (ix) Lead Counsel's Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses; (x) Compendium of Unreported Authorities in Support of Motion for an Award of Attorneys' Fees and Expenses; and (xi) all other proceedings herein, Lead Plaintiffs will move this Court, before the Honorable Paul A. Crotty, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 11D, 500 Pearl Street, New York, New York on April 9, 2014, at 4:45 p.m., for entry of orders and judgments pursuant to Rule 23 of the Federal Rules of Civil Procedure (1)

finally approving the settlement of the captioned litigation, (2) approving the Plan of Allocation of settlement proceeds, and (3) awarding Lead Counsel attorneys' fees, plus expenses in the litigation.

DATED: January 8, 2014

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART

s/ Ellen Gusikoff Stewart
ELLEN GUSIKOFF STEWART

655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
elleng@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
EVAN J. KAUFMAN
CHRISTOPHER M. BARRETT
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
ekaufman@rgrdlaw.com
cbarrett@rgrdlaw.com

BROWER PIVEN,
A Professional Corporation
DAVID A.P. BROWER
BRIAN C. KERR
475 Park Avenue South, 33rd Floor
New York, NY 10016
Telephone: 212/501-9000
212/501-0300 (fax)
brower@browerpiven.com
kerr@browerpiven.com

BROWER PIVEN,
A Professional Corporation
CHARLES J. PIVEN
1925 Old Valley Road
Stevenson, MD 21153
Telephone: 410/332-0030
piven@browerpiven.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 8, 2014.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART

ROBBINS GELLER RUDMAN
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-3301

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: elleng@rgrdlaw.com

Mailing Information for a Case 1:11-cv-06341-PAC

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Christopher Michael Barrett**
cbarrett@rgrdlaw.com,e_file_ny@rgrdlaw.com
- **Jeffrey A. Berens**
jeff@dyerberens.com
- **David A.P. Brower**
brower@browerpiven.com,reception@browerpiven.com
- **Marshall Pierce Dees**
mdees@holzerlaw.com
- **Michael Ira Fistel , Jr**
mfistel@holzerlaw.com,cholzer@holzerlaw.com,cyoung@holzerlaw.com
- **Mark Putnam Gimbel**
mgimbel@cov.com,maony@cov.com
- **Richard William Gonnello**
rgonnello@faruqilaw.com,ttang@faruqilaw.com,sbentsianov@faruqilaw.com,msullivan@faruqilaw.com,ecf@faruqilaw.com,fmcconville@faruqilaw.com
- **David William Haller**
dhaller@cov.com,maony@cov.com
- **Barbara J. Hart**
bhart@lowey.com
- **Evan Jay Kaufman**
ekaufman@rgrdlaw.com
- **Brian C. Kerr**
kerr@browerpiven.com
- **James N. Kramer**
jkramer@orrick.com,jcopoulos@orrick.com,jthompson@orrick.com,clouie@orrick.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,lpvega@pomlaw.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Ellen Anne Gusikoff Stewart**
elleng@rgrdlaw.com
- **Michael D. Torpey**
mtorpey@orrick.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Charles J. Piven
Brower Piven, A Professional Corporation
1925 Old Valley Road
Stevenson, MD 21153

James E Thompson
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105